

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

UNITED STATES OF AMERICA,)
)
)
Plaintiff,) **CR. NO. 1:19-cr-10041-JDB-2**
)
)
vs.)
)
CHARLES ALSTON,)
)
Defendant.)

JOINT MOTION TO CONTINUE

The parties hereby jointly move this court to continue the February 8, 2021, Trial Date for Charles Alston, to July 2021. In support of this motion, the parties represent that:

1. Since March 2020, due to COVID-19, a number of jury trial dates have been modified and/or continued. On December 30, 2020, the Western District of Tennessee extended an Order continuing jury selection and jury trials through January 29, 2021, until further notice.
2. Defendant Charles Alston is scheduled for trial February 8, 2021, on charges of conspiracy and unlawful distribution of controlled substances, outside the scope of professional practice and not for a legitimate medical purpose. Defendant Alston is not detained pre-trial.
3. Both the government and the defense have provided notice of experts who are anticipated to testify at Alston's trial. The government understands that its anticipated expert is undergoing COVID-19 vaccination, but the process may not be fully completed by February 8, 2021. Given the timing, the expert has

expressed a preference for traveling and appearing after the vaccination process is complete. In addition, the parties hope to avoid additional costs associated with preparing witnesses, including experts, and travel in the coming weeks, where the ongoing public health crisis may result in a continuance close to the February 8 date.

4. The parties understand that the Court is not currently available for a continued trial date before June 2021. The parties request that this trial be continued to the week of July 12, 2021 or July 19, 2021.
5. The parties submit that given the circumstances, the interest of justice is served in allowing for additional time to prepare and outweighs the need for a speedy trial.

Respectfully submitted,

By: /S/ Jillian Willis
JILLIAN D. WILLIS
LESLIE WILLIAMS FISHER
Trial Attorneys
United States Department of Justice
Criminal Division, Fraud Section

/S/
MANUBIR S. ARORA
WORRICK G. ROBINSON, IV
Counsel for Charles Alston

CERTIFICATE OF SERVICE

I, Jillian Willis, Trial Attorney in the United States Department of Justice, Criminal Division, hereby certify that a copy of the foregoing pleading was forwarded by electronic means via the court's electronic filing system to counsel for the defendant.

THIS the 8TH day of January, 2021.

/S/ Jillian Willis
JILLIAN D. WILLIS
Trial Attorney
United States Department of Justice
Criminal Division, Fraud Section